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19 *Attorneys for Snow Covered Capital, LLC*

20 **UNITED STATES DISTRICT COURT**
 21 **DISTRICT OF NEVADA**

22 SNOW COVERED CAPITAL, LLC,
 23 Plaintiff,

24 vs.

25 JODI FONFA; EVAN FONFA, an individual
 26 and in his capacity as the Trustee of THE
 27 EVAN FONFA 2018 TRUST dated December
 28 26, 2018; THE EVAN FONFA 2018 TRUST
 29 dated December 26, 2018; and DOE
 DEFENDANTS I THROUGH X.

30 Defendants.

31 Case No.: 2:22-cv-01181-CDS -BNW

32 **STIPULATION AND ORDER TO**
EXTEND DEADLINE FOR
RESPONDING TO SUBPOENAS
(FIRST REQUEST)

33 Plaintiff Snow Covered Capital, LLC (“SCC”), Defendant Jodi Fonfa (“J. Fonfa”),
 34 Defendant Evan Fonfa, individually and in his capacity as the Trustee of the Evan Fonfa 2018 Trust
 35 dated December 26, 2018 (“E. Fonfa”), The Evan Fonfa 2018 Trust dated December 26, 2018 (“E.
 36 Fonfa Trust”), Linda Goodell (“L. Goodell”), ABF, Inc. (“ABF”), and HEJ Holdings LLC (“HEJ”)
 37 and collectively with J. Fonfa, E. Fonfa, E. Fonfa Trust, L. Goodell, and ABF, the “Parties”), by
 38 and through their undersigned counsel, for good cause shown, hereby stipulate and agree as follows:

1 **I. GENERAL MATTERS**

2 1. SCC has served subpoenas upon HEJ and L. Goodell.
3 2. SCC has not yet been able to serve its subpoena upon ABF.
4 3. HEJ, L. Goodell and ABF retained Naylor & Brastor to represent their interests in
5 connection with the subpoenas on Friday, August 25, 2023.
6 4. HEJ and L. Goodell have requested additional time to respond to the subpoenas.

7 **II. STIPULATION**

8 Therefore, the Parties agree that as follows:

9 1. HEJ, L. Goodell, and ABF will provide SCC with a copy of their written objections
10 to the SCC subpoenas, if any, by August 29, 2023.
11 2. Naylor & Braster will accept service of the subpoena on behalf of ABF.
12 3. HEJ, L. Goodell and ABF shall have until Monday, September 11, 2023, to respond
13 to the subpoenas.
14 4. The parties shall work together to schedule the depositions of ABF, HEJ and
15 Goodell before October 1, 2023.

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5. The Parties waive any complaints that this discovery is being conducted after the current September 1, 2023, discovery deadline.

SNELL & WILMER L.L.P.

THE JIMMERSON LAW FIRM, P.C.

/s/ Bob L. Olson

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*Attorneys for Linda Goodell, ABF, Inc., and
HEJ Holdings, LLC*

ORDER

IT IS SO ORDERED.

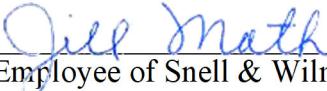
UNITED STATES DISTRICT COURT JUDGE

DATED: August 30, 2023

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 29, 2023, I electronically filed the foregoing
3 **STIPULATION AND ORDER TO EXTEND DEADLINE FOR RESPONDING TO**
4 **SUPBOENAS (FIRST REQUEST)** with the Clerk of Court for the U.S. District Court, District
5 of Nevada by using the Court's CM/ECF system. Participants in the case who are registered
6 CM/ECF users will be served by the CM/ECF system.

7 DATED this 29th day of August 2023.

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10 An Employee of Snell & Wilmer L.L.P.
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